

**FILED**

FEB 13 2018

**Mark Allen Peters #580565**  
**Lawton Correctional Facility**  
**8607 S.E. Flower Mound Rd.**  
**Lawton, Oklahoma 73501**

F. CARMELITA REEDER SHINN, CLERK  
 U.S. DIST. COURT, WESTERN DIST. OKLA.  
 BY ENM DEPUTY

**UNITED STATES DISTRICT COURT  
 FOR THE WESTERN DISTRICT OF OKLAHOMA**

**MARK ALLEN PETERS,**  
**Plaintiff,**

**CIV****18 - 0144 H E****-v-**

**OKLAHOMA DEPARTMENT OF  
 CORRECTIONS, JOE ALLBAUGH,  
 DR. JOEL MCCURDY, GEO GROUP, INC.,  
 HECTOR RIOS, CORRECT CARE  
 SOLUTIONS, CHRISTINA THOMAS,  
 SHIRLEY STOUFFER, NURSE PARKS,  
 NURSE GARY, NURSE SAVOY,  
 MS RICHMOUND, MS HOLMBURG,  
 JOHN DOE, JANE DOE,**  
**Defendants.**

**ALL DEFENDANTS SUED IN THEIR  
 OFFICIAL AND INDIVIDUAL CAPACITIES.**

**CASE NO.:** \_\_\_\_\_  
 (To be supplied by the Clerk)

**CIVIL RIGHTS COMPLAINT  
 PURSUANT TO 42 U.S.C. § 1983**

**JURY TRIAL DEMANDED**

**A. JURISDICTION**

**Parties to the Complaint:**

**A) The Plaintiff,**

Plaintiff Mark Peters, Pro Se, is a citizen of Lawton, Oklahoma, who presently resides at Lawton Correctional Facility (LCF); 8607 S.E. Flower Mound Road; Lawton, Oklahoma 73501

**B) The Defendants,**

1. Defendant Oklahoma Department of Corrections, is a Government Agency of the State of Oklahoma, located at 3400 N Martin Luther King Oklahoma City, OK 73111-4298, At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: Plaintiff is in the custody and care of the Oklahoma Department of Corrections (ODOC). ODOC is responsible for Plaintiff's health, safety and overall well-being while in their custody, or in the custody of their contracted agents.
2. Defendant Joe Allbaugh, is a citizen of Oklahoma City, Oklahoma, and is employed as Director of ODOC, located at 3400 N Martin Luther King Oklahoma City, OK 73111-4298. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: He was on duty as Director of ODOC and is responsible for the safe operation of ODOC and its contracted agents/private prisons. He is responsible in his official and individual capacity.
3. Defendant Dr. Joel M<sup>c</sup>Curdy, is a citizen of Oklahoma City, Oklahoma, and is employed as Chief Medical Officer of ODOC, located at 2901 North Classen Boulevard, Suite 200, Oklahoma City, Oklahoma 73106-5463. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: He was on duty as Chief Medical Officer of ODOC, and is responsible for all Medical and Healthcare needs and services provided to all ODOC inmates to

include all Oklahoma inmates in contracted Private Prisons, (GEO/LCF), such as the Plaintiff. He is responsible in his official and individual capacity.

4. Defendant GEO Group, Inc., is a citizen of One Park Place 621 NW 53<sup>rd</sup> Street Suite 700, Boca Raton, FL 33487 and 8607 S.E. Flower Mound Road, Lawton, OK 73501, and is employed/contracted as a Private Prison provider to ODOC, providing private prison bed space to house Oklahoma inmates, due to overcrowding at ODOC facilities. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: The Geo Group, Inc. is a Private Prison company, operating Lawton Correctional Facility, (LCF), located in Lawton, Oklahoma. GEO Group, Inc./LCF is a Contractor/Agent employed by ODOC, and is also responsible for Plaintiff's health, safety and overall well-being.
5. Defendant Hector Rios, is a citizen of Lawton, Oklahoma, and is employed as Warden, at Lawton Correctional Facility, located at 8607 S.E. Flower Mound Road, Lawton, OK 73501. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: He is the Warden at Lawton Correctional Facility, a private prison owned by GEO Group, Inc., under contract by ODOC. He is responsible in his official and individual capacity.
6. Defendant Correct Care Solutions is a corporate citizen of 1283 Murfreesboro Road, Suite 500, Nashville, Tennessee 37217 and 8607 S.E. Flower Mound Road, Lawton, OK 73501, and is employed/contracted as the Medical and

Healthcare Services Provider, contracted to Lawton Correction Facility, to include Plaintiff. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: Correct Care Solutions, (CCS), are under contract to provide medical and healthcare services to Oklahoma inmates, located at the LCF, a private prison owned and operated by GEO Group Inc., CCS is also responsible for Plaintiff's health, safety and overall well-being.

7. Defendant Christina Thomas is a citizen of Lawton, Oklahoma, and is employed as Correctional Health Services Administrator, through CCS. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Correctional Health Services Administrator, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates. To include the Plaintiff.
8. Defendant Shirley Stouffer is a citizen of Lawton, Oklahoma, and is employed as Correctional Health Services Administrator, through CCS. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Correctional Health Services Administrator, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates. To include the Plaintiff.

9. Defendant Nurse Parks is a citizen of Lawton, Oklahoma, and is employed as a Nurse/Healthcare Professional. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Nurse/Healthcare Professional, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates, to include the Plaintiff.
10. Defendant Nurse Gary is a citizen of Lawton, Oklahoma, and is employed as a Nurse/Healthcare Professional. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Nurse/Healthcare Professional, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates, to include the Plaintiff.
11. Defendant Nurse Savoy is a citizen of Lawton, Oklahoma, and is employed as a Nurse/Healthcare Professional. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Nurse/Healthcare Professional, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates, to include the Plaintiff.
12. Defendant Nurse Richmond is a citizen of Lawton, Oklahoma, and is employed as a Nurse/Healthcare Professional. At the time the claim(s)

alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Nurse/Healthcare Professional, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates, to include the Plaintiff.

13. Defendant Nurse Holmburg is a citizen of Lawton, Oklahoma, and is employed as a Nurse/Healthcare Professional. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Nurse/Healthcare Professional, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates, to include the Plaintiff.

14. Defendant Nurse Tocknell is a citizen of Lawton, Oklahoma, and is employed as a Nurse/Healthcare Professional. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☒ No ☐ If your answer is "Yes", briefly explain: She was on duty in her official and individual capacity as a Nurse/Healthcare Professional, employed by CCS, at Lawton Correctional Facility. CCS is contracted to provide medical care to Oklahoma Inmates, to include the Plaintiff.

15. Defendant John/Jane Doe is a citizen of "To Be Determined", (TBD), and is employed as TBD. At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes ☐ No ☐ If your answer is "Yes", briefly explain: TBD.

C) Jurisdiction is invoked pursuant to: **28 U.S.C. §1331; 28 U.S.C. §1343(3); 42 U.S.C. §1983; Eighth (8<sup>th</sup>) and Fourteenth (14<sup>th</sup>) Amendment, U.S. Const.**

(If you wish to assert jurisdiction under different or additional statutes, you may list them below.)

**51 Okl.St. § 153; 57 Okl.St § 561; 57 Okl.St. § 561.2**

## **B. NATURE OF THE CASE**

1) Briefly state the background of your case.

Plaintiff, is a white male, 59 yrs old, incarcerated in the Oklahoma Department of Corrections, (ODOC), currently housed at Lawton Correctional Facility, (LCF), in Lawton, Oklahoma, owned and operated by the Geo Group, Inc., a private prison contractor to ODOC. Plaintiff has been denied his constitutionally and statutorily protected right (s), to a *safe and healthy environment*, and to *be provided competent medical and healthcare in compliance with the accepted "standards of care", and due process*. Due to Defendants intractable and deliberate indifference, culpable negligence, and intentional failure to protect, and by their corporate acts and omissions, the Defendants, did cause Plaintiff to be injured. On 2 December 2016, Plaintiff was violently assaulted and battered by his cellmate, which gives rise to a "failure to protect", under the Eighth (8<sup>th</sup>) Amendment. Plaintiff was put into the "Segregated Housing Unit", (SHU). Plaintiff was given and administered the wrong medications on several occasions, while being housed at LCF. While in the "SHU", on 9 January 2017, Plaintiff was given the improper medications, resulting in severe injury to Plaintiff. Plaintiff sustained a fractured vertebrae in his lower back. *Plaintiff was not provided proper medical care* from Correct Care Solutions and it's staff, The Geo Group, Inc. and it's staff, or Oklahoma Department of Corrections and it's staff. Thus, giving rise to further violations of the Plaintiff's right to "medical care" and to be "free from cruel and unusual



punishment", as guaranteed under the Eighth (8<sup>th</sup>) Amendment. Plaintiff's right to "Due Process", under the Fourteenth (14<sup>th</sup>) Amendment has also been abrogated by Defendants.

### C. CAUSE OF ACTION

- 1) I allege that the following of my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for Plaintiff allegations: (If necessary you may attach up to two additional pages (8½" x 11") to explain any allegation or to list additional supporting facts.)

#### COUNT I:

**DEFENDANTS VIOLATED HIS EIGHTH (8<sup>TH</sup>) AMENDMENT RIGHTS AND PROTECTIONS AS GUARANTEED UNDER THE U.S. CONSTITUTION, BY "FAILING TO PROTECT" THE PLAINTIFF, RESULTING IN SEVERE INJURIES TO PLAINTIFF.**

#### SUPPORTING FACTS:

Plaintiff, is a white male, 59 yrs old, who was put into the "Segregated Housing Unit", (SHU), on 2 December 2016 for protective custody. Due to Plaintiff's cellmate, who was "*high on dope*", violently assaulted and battered the Plaintiff, causing severe injury to him. During the assault, Plaintiff had no choice but to defended himself. Plaintiff and his assailant, (cellmate), were locked in the cell together during a routine "count time", approximately on or about 14:15 in the afternoon of 2 December 2016. While being assaulted and battered, Plaintiff was able to push the panic-button several times. ***No guard responded to Plaintiff several calls and requests for help and assistance.*** This is truly a case of blatant "failure to protect". Plaintiff was unable to get a guard to respond when he pushed the panic button in his cell, several times. Finally a friend of the Plaintiff, saw the commotion and what was going on in the Plaintiff's cell, he was able to get the door open, and render aid to the Plaintiff. He pulled the assailant off



of the Plaintiff and got him out of the cell, saving Plaintiff's life. Plaintiff was brutally assaulted, attacked, and battered, by the Plaintiff's cellmate, resulting in severe injuries. Plaintiff sustained a fractured nose, severe black eye, and several contusions.

### COUNT II:

**DEFENDANTS WILLFULLY AND INTENTIONALLY DENIED PLAINTIFF'S EIGHTH (8<sup>TH</sup>) AMENDMENT RIGHTS AND PROTECTIONS, AS GUARANTEED UNDER THE U.S. CONSTITUTION, BY FAILING TO PROVIDE THE PLAINTIFF PROPER MEDICAL CARE. DEFENDANTS, DUE TO THEIR DELIBERATE INDIFFERENCE, CORPORATE NEGLIGENCE, AND CORPORATE ACTS AND OMISSIONS, DID GIVE AND ADMINISTER THE PLAINTIFF WRONG AND IMPROPER MEDICATIONS, CAUSING PLAINTIFF TO SUFFER SIGNIFICANT INJURY, RESULTING IN A FRACTURED VERTEBRAE IN HIS BACK AND CONTINUES TO SUFFER FROM ONGOING CHRONIC PAIN AND DISABILITY.**

### **SUPPORTING FACTS:**

On 9 January 2017, Plaintiff was given his morning medication at about 3:30 am and went back to bed. A few hours later Plaintiff attempted to get up, to give the Corrections Officer, (C/O), Clark, from the Law Library, who was coming by, cell to cell, to provide forms, legal papers, and to pick-up Plaintiff's Legal Documents. On the above date *Plaintiff was given the incorrect medication, resulting in a strong adverse reaction to the incorrect medication, causing him to have absolutely no control over his legs or any coordination of his lower extremities.* Plaintiff stood up, made about 2 steps and collapsed. Plaintiff fell straight to the floor, as was witnessed by C/O Clark, the Law Library Assistant Supervisor. C/O Clark immediately obtained a video camera and started recording the incident. Plaintiff was taken to Medical Department and just left in an unattended room.

The second (2<sup>nd</sup>) incident of improper administration of medications: On 5<sup>th</sup> March 2017, Nurse Tocknell *again refused* to allow the Plaintiff to see his medications, during

the morning “pill-pass”. Approximately an hour or so later, the Plaintiff’s cellmate tried to wake him up for breakfast, *but could not do so*, they had to call a code blue, requiring emergency medical staff to respond. Fortunately, the medical staff were able to revive the Plaintiff in his cell. Nurse Tocknell stated that the Plaintiff had a seizure. Plaintiff has had seizures in the past, but none like this one. Plaintiff stated, it was completely different than any other seizure that he has ever had.

The third (3<sup>rd</sup>) incident of improper administration of medications: On 11<sup>th</sup> March 2017, when Nurse Savoy brought Plaintiff his morning medications, Nurse Savoy, again, would not allow the Plaintiff to see the medication(s) to ensure he was getting the proper medication(s). Plaintiff anticipated an issue with his medication(s), he was ready. Plaintiff knew there was a significant problem with his medication(s). Plaintiff had 2 cups, 1 for the crushed medication(s) and 1 for the Metformin, Zoloft, Atenolol, Lisinopril, Topamax. Again the blood red pill shows up. The problems with the Plaintiff’s medications seemed to only occur on weekends. Plaintiff stopped Nurse Savoy, and asked her what that blood red pill was. Nurse Savoy, first said it was his Topamax from their stock, but the Plaintiff’s Topamax is tan. The Plaintiff observed his Topamax, sitting off to the side inside the cup. Plaintiff showed Nurse Savoy, and She said, “... to take the blood red pill out and flush it...”.

### **COUNT III:**

**DEFENDANTS WILLFULLY AND INTENTIONALLY DENIED PLAINTIFF’S EIGHTH (8<sup>TH</sup>) AMENDMENT RIGHTS AND PROTECTIONS, AS GUARANTEED UNDER THE U.S. CONSTITUTION, BY FAILING TO PROVIDE THE PLAINTIFF PROPER MEDICAL CARE. DEFENDANTS, DUE TO THEIR DELIBERATE INDIFFERENCE, CORPORATE NEGLIGENCE, AND INTENTIONAL DENIAL OF MEDICAL CARE, HAVE CAUSED BY THEIR CORPORATE ACTS AND OMISSIONS, THE PLAINTIFF TO SUFFER SIGNIFICANT PAIN AND FURTHER INJURY, RESULTING IN ONGOING CHRONIC PAIN AND DISABILITY.**

**SUPPORTING FACTS:**

On 9 January 2017, Plaintiff was in a medical exam room, LT. Ellington, from security, at LCF, came in and asked the Plaintiff, what had happened. While Plaintiff was in the Medical Department of the facility, Nurse Tocknell checked his vital signs. Plaintiff, while in medical, was not seen by a doctor, or physically examined in any way. The “standard of care” was not followed. Plaintiff was sent back to his cell without any type of an examination or X-Rays. The next day, Plaintiff submitted an emergency sick call, *but was refused by Nurse Parks* and sent back to his cell after being told, “Oh you’re all right”. On 12 January 2017, Plaintiff was finally seen by Nurse Practitioner Ginetta NGanga, (*not a Doctor*). She did not do any type of physical examination, but did order an X-Ray. Which Plaintiff later found out was of his upper spine. *Plaintiff did inform Nurse Practitioner Ginetta NGanga, that his pain was in his lower spine.* Plaintiff had submitted several medical requests, on 9 January 2017, 17 January 2017, 19 January 2017, 1 February 2017, and a Request To Staff, (RTS), on 4 February 2017 complaining of severe pain in his lower back and asking about the results of his X-Rays. Plaintiff also made numerous verbal requests of the “pill-pass” Nurses and Nurse Richmond, who was the Head Nurse, to please get him in to be seen by the Doctor. The “pill-pass” Nurses and Nurse Richmond kept telling the Plaintiff they would get him in too be seen by the Doctor. On 8 February 2017 Plaintiff was told on his RTS, that he had submitted on 4 February 2017, that he had an appointment to be seen. On 8 March 2017, Plaintiff was finally seen by Dr. Musullam, who said, He had seen something in the X-Rays, but wanted more X-Rays, which were taken on 14 March 2017. On 22 March 2017, Plaintiff was taken to the Medical Department. Dr. Musullam along with the Nurse Practitioner

Ginetta NGanga and Corrections Officer, (C/O), Hernandez, in the examination room, informed him that he had fractured his L-1 vertebra. *(A full 72 days elapsed with out proper medical care.)*

*Defendants waited 2½ months, (72 days), before providing any “meaningful” medical care, which caused severe and excruciating pain, exacerbation and aggravation of Plaintiff’s pre-existing medical conditions, also causing significant mental and emotional distress and anguish. Thus, substantiating a claim of “deliberate indifference” to Plaintiff’s serious medical issues, and the “wanton and willful infliction of pain”. Giving rise to Plaintiff’s claim in Count IV.*

#### **COUNT IV:**

**DEFENDANTS VIOLATED PLAINTIFF’S EIGHTH (8<sup>TH</sup>) AMENDMENT RIGHTS AND PROTECTIONS, AS GUARANTEED UNDER THE U.S. CONSTITUTION, BY SUBJECTING PLAINTIFF TO “CRUEL AND UNUSUAL PUNISHMENT”. DEFENDANTS, DUE TO THEIR DELIBERATE INDIFFERENCE, CORPORATE NEGLIGENCE, AND INTENTIONAL DENIAL OF MEDICAL CARE, HAVE CAUSED BY THEIR CORPORATE ACTS AND OMISSIONS, THE PLAINTIFF TO SUFFER WANTON AND WILLFUL INFLICTION OF PAIN, FURTHER EXACERBATING PLAINTIFF’S INJURY, RESULTING IN ONGOING CHRONIC PAIN AND DISABILITY.**

#### **SUPPORTING FACTS:**

*Plaintiff has the right to be free from the willful and intentional infliction of cruel and unusual punishments as guaranteed by the Eighth (8<sup>th</sup>) Amendment. Courts Have upheld, that a violation of Eighth (8<sup>th</sup>) Amendment rights has been found when there is an intentional denial of needed medical care, or when a prison officials conduct indicates deliberate indifference to the medical needs of prisoners.*

**COUNT V:**

**DEFENDANTS VIOLATED PLAINTIFF'S FOURTEENTH (14<sup>TH</sup>) AMENDMENT PROTECTIONS AS GUARANTEED UNDER THE U.S. CONSTITUTION BY FAILING TO PROVIDE PROCEDURAL DUE PROCESS OF LAW PRIOR TO ANY CONSTITUTIONAL DEPRIVATION.**

**SUPPORTING FACTS:**

The Plaintiff's due process right is couched in terms of the Plaintiff's right to be free from an abuse of discretion on the part of prison/medical administrators; protection from unconstitutional administrative action, or inaction; protection of a Plaintiff's life and health from administrative action. Defendants did interfere with Plaintiff's protected life, liberty interest (s), and Defendants did violate procedural safeguards rendering them constitutionally insufficient to protect Plaintiff against unjustified deprivations.

**D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF:**

- 1) Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to the conditions of your imprisonment? Yes \_\_\_ No X. If your answer is "Yes", describe each lawsuit. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

a) Parties to previous lawsuit: \_\_\_\_\_

Plaintiffs: N/A

Defendants: N/A

b) Name of court and docket number: N/A

c) Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

d) Issues raised: N/A

e) Approximate date of filing lawsuit: N/A

f) Approximate date of disposition: N/A

- 2) I have previously sought informal or formal relief from the appropriate administrative officials regarding the acts complained of in Part C. Yes X No    .If your answer is "Yes", briefly describe how relief was sought and the results. If your answer is "No", briefly explain why administrative relief was not sought.

Plaintiff filed many "Request To Staffs"(s), (RTS) and Grievances to Ms. Thomas, Health Service Administrator in compliance with ODOC Policy OP-090124. Then Plaintiff sent the Grievance Appeal's to Joel M<sup>c</sup>Curdy, Chief Medical Officer, for ODOC, in Oklahoma City, Oklahoma, in compliance with ODOC Policy OP-090124, no remedy or relief was granted to the Plaintiff at any time.

**E. REQUEST FOR RELIEF:**

- 1) I believe that I am entitled to the following relief:

**Compensatory Damages in the amount of: \$ 3,000,000.00**

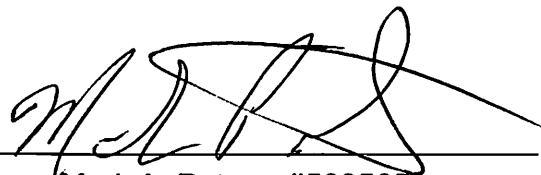
**Punitive Damages in the amount of: \$ 5,000,000.00**

**Declaratory Judgment: Defendants violated Plaintiff's Constitutional Rights.**

**Injunctive Relief: To prevent future and similar violations by Defendants.**

Pro Se

Signature of Attorney



Mark A. Peters, #580565

Plaintiff, Pro Se

LCF, 7-A-102

8607 S.E. Flower Mound Road

Lawton, Oklahoma 73501

(580) 351-2778

**VERIFICATION**

STATE OF OKLAHOMA       )  
  ) **SS:**  
COUNTY OF COMANCHE    )

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that he is the Plaintiff in the above titled action, that he has read the above complaint, and the information contained therein is true and correct, pursuant to 28 U.S.C. § 1746; 18 U.S.C. §1621; Title 12 O.S. § 426

Executed at:   Lawton Correctional Facility  
                  8607 S.E. Flower Mound Road  
                  Lawton, Oklahoma 73501

On:               9 February 2018

\_\_\_\_\_  
Mark A. Peters

Affiant's Name

\_\_\_\_\_  
Affiant's Signature  
\_\_\_\_\_